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Via ECF and Hand Delivery

August 8, 2018

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Amarpreet Dhalialiwal v. HYPR Corp. and George Avetisov., 17-cv-7959 (GBD)

Dear Judge Daniels:

In anticipation of the conference, set for August 9, 2018, we write on behalf of Defendants HYPR Corp. and George Avetisov, to respond to discovery issues raised in Plaintiff's August 8, 2018 letter.

Plaintiff raises two discovery issues. First, Plaintiff asks the Court to order production of unredacted versions of certain documents referring to "friends and family" investors in HYPR Corp. We have since informed Plaintiff's counsel that we will produce such documents, on an attorneys' eyes only basis. Accordingly, that issue is now moot.

Second, Plaintiff asks the Court to order production of "monthly and annual financial statements of HYPR showing revenues." Plaintiff correctly points out that in meet and confer sessions, Defendants agreed to produce "**periodic** financial statements." Defendants have produced a profit and loss statement that details total income on an annual basis, for each year in HYPR's corporate history. (See Exhibit H to Plaintiff's August 8, 2018 Letter, Dkt. No. 37.) Plaintiff has never proffered any reason why more granular figures are necessary in this action. Accordingly, Plaintiff's request should be denied.

In his August 8 letter, Plaintiff also responds to a discovery issue raised in our August 3 letter, regarding redactions based on "non-responsiveness." We will address Plaintiff's response orally at the conference tomorrow morning.

Respectfully,

/s/ Jonathan Bach

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